

REMARKS/ARGUMENTS

Claims 1-30 are pending in this application. By this Amendment, the drawings and claims 1-2, 4, 7, 14-15, 17, 19, 21 and 24-26 are amended. Support for the claims can be found throughout the specification, including the original claims, and the drawings. Reconsideration and withdrawal of the rejections in view of the above amendments and the following remarks is respectfully requested.

The Office Action rejects claims 1-2, 7-8, 14-16, 19-24, and 26-30 under 35 U.S.C. §103(a) as being unpatentable over Bridson, U.S. Patent No. 6,359,270 (hereinafter "Bridson") in view of Norwood, U.S. Patent No. 5,063,600 (hereinafter "Norwood"). The rejection is respectfully traversed.

Independent claim 1 recites a display unit provided on an outer surface of the refrigerator, a touchscreen provided on an outer surface of the display unit and configured to receive image data written or drawn on the touchscreen by a user, a memory device provided within the display unit and configured to store the image data, and a controller provided within the display unit and configured to store the image data input through the touchscreen into the memory device. As acknowledged by the Examiner in the remarks regarding independent claim 1, Bridson neither discloses nor suggests such features, or the claimed combination.

Rather, Bridson discloses a communications module 12 for a microwave oven, including a liquid crystal display (LCD) 20 with a touch screen overlay (not shown). The communications

module 12 and touchscreen provide "point and select" type functionality, allowing a user to select from the specific options displayed to control cooking functions, or to access online functions through a web browser. Bridson does not disclose or suggest that the touchscreen is able to receive image data written or drawn on the touchscreen, nor a controller or memory device configured to store the image data.

Additionally, although Bridson alludes to the idea that the communications module 12 may be applied to a "domestic appliance," Bridson's communications module 12 and touchscreen are specifically designed to control cooking functions of the microwave oven, and to access and use web based functions. Bridson does not disclose or suggest that the communications module 12 can receive, store, or retrieve information other than that provided by the icons and selection buttons displayed. Rather, Bridson's communication module 12 simply allows a user to control functions of the appliance and access online applications, regardless of the type of household appliance it is installed on.

Further, Norwood fails to overcome the deficiencies of Bridson. Norwood discloses a hybrid information management system which allows both handwritten and keyboard entered information to be processed by a computer system. Norwood's system includes a composite entry and display device, or screen tablet 18, composed of a flat panel display 20 and a transparent digitizing tablet 22. A user may write on the surface of the tablet 22 with a pen 24, and the writing 25 is displayed on the display 20. A user may switch between a "writing" mode

and a "choosing" mode by depressing a button 38 on a side of the pen 24. When in choosing mode, the tip of the pen 24 becomes a graphic cursor 36. The pen can also be put into "select" mode, in which placing and dragging the pen 24 encloses selected material on the display 20 for manipulation. Information may also be entered through a peripheral keyboard.

The tablet 22 is connected to a separate, stand alone computer 21 by a cable 19, and the display 20 is separately connected to a bus of the computer 21 by a cable 23. The software component of Norwood's system is based on a set of five application programs, and enable a number of complex functions, such as management of appointment books, to-do lists, file folders, a scratch pad, stick-on notes, and reminder files. Examples of these functions and the associated screens are shown in Figures 4-17 of Norwood. Norwood clearly discloses that this extensive functionality requires a dedicated, stand-alone computer system 21 linked to components of the screen tablet 18 through the various cables 19 and 23. Norwood does not disclose or suggest that this screen tablet 18 and its computer support system could be combined into a single display unit which could be reasonably mounted on a surface of a domestic appliance, and with a memory device and controller provided within the display unit. Rather, these functions necessitate the support of the separate computer 21 and associated cables 19 and 23. Thus it is respectfully submitted that Norwood fails to overcome the deficiencies of Bridson.

Further, it is respectfully submitted that the combination of Bridson with Norwood is improper. Bridson relates to a display for functional control of a microwave oven, whereas Norwood relates to a stand-alone computer system with extensive information processing capability. The Office Action appears to suggest that it would have been obvious to one of ordinary skill in the art to incorporate the screen tablet of Norwood and Norwood's information management system into the communications module and touchscreen of Bridson's microwave oven. However, Norwood provides no teaching or suggestion as to how the disclosed information management system could be adapted, both in size and capability, such that this combination could be achieved. Thus, it is respectfully submitted that this combination requires the improper use of impermissible hindsight gleaned from Applicant's own disclosure to arrive at the asserted combination. Further, a system combined as such would destroy the simplicity and functionality of Bridson's microwave oven and result in a diminished level of utility to the user. For these additional reasons, it is respectfully submitted that the combination of Bridson and Norwood is improper, and thus the rejection should be withdrawn on these grounds as well.

For all of the above reasons, it is respectfully submitted that independent claim 1 is allowable over the applied combination, and thus the rejection of independent claim 1 under 35 U.S.C. §103(a) over Bridson in view of Norwood should be withdrawn. Dependent claim 14 is allowable at least for the reasons discussed above with respect to independent claim 1, from which it depends, as well as for its added features.

Independent claim 2 recites a display unit provided on a surface of the refrigerator, a touchscreen provided on an outer surface of the display unit and configured to receive information on items stored in the refrigerator in the form of user generated image data, a memory device provided within the display unit and configured to store the image data on the items stored in the refrigerator input through the touchscreen, and a controller provided within the display unit and configured to control the touchscreen and the memory device so as to display the image data on the items stored in the refrigerator on the touchscreen and to store the image data on the items stored in the refrigerator into the memory device. As set forth above, Bridson neither discloses nor suggests such features. Further, Bridson fails to disclose or suggest the claimed combination in independent claim 2.

Further, as set forth above, Norwood fails to overcome the deficiencies of Bridson, in that Norwood's screen tablet 18 is enabled by a separate, stand alone personal computer 21, and Norwood does not disclose or suggest that this system could be reasonably adapted to a system such as the touchscreen and communications module disclosed by Bridson to arrive at the apparatus for inputting and displaying data for a refrigerator as recited in independent claim 2.

Accordingly, it is respectfully submitted that independent claim 2 is allowable over the applied combination, and thus the rejection of independent claim 2 under 35 U.S.C. §103(a) over Bridson in view of Norwood should be withdrawn. Dependent claims 15-16 are allowable at

least for the reasons discussed above with respect to independent claim 2, from which they depend, as well as for their added features.

Independent claim 7 recites, *inter alia*, receiving image data generated by a user related to information for the specific date into the input screen. As set forth above and as acknowledged by the Examiner, Bridson neither discloses nor suggests such features, or the claimed combination. Further, as set forth above, Norwood is not properly combined with Bridson, and thus fails to overcome the deficiencies of Bridson.

Accordingly, it is respectfully submitted that independent claim 7 is allowable over the applied combination, and thus the rejection of independent claim 7 under 35 U.S.C. §103(a) over Bridson in view of Norwood should be withdrawn. Dependent claims 8-9 and 19-20 are allowable at least for the reasons discussed above with respect to independent claim 7, from which they depend, as well as for their added features.

Independent claim 21 recites, *inter alia*, providing an input screen configured to receive image data written or drawn thereon by a user. As set forth above and as acknowledged by the Examiner, Bridson neither discloses nor suggests such features, or the claimed combination. Further, as set forth above, Norwood is not properly combined with Bridson, and thus fails to overcome the deficiencies of Bridson.

Accordingly, it is respectfully submitted that independent claim 21 is allowable over the applied combination, and thus the rejection of independent claim 21 under 35 U.S.C. §103(a)

over Bridson in view of Norwood should be withdrawn. Dependent claims 22-24 are allowable at least for the reasons discussed above with respect to independent claim 21, from which they depend, as well as for their added features.

Independent claim 26 recites a display unit mounted on the product and configured to allow for input of image data generated by a user, a touchscreen mounted on an outer surface of the display unit, a memory device provided within the display unit and configured to receive and to store the image data, and a controller provided within the display unit and configured to control the memory device and the touchscreen so as to store the image information in the memory device, and to display the image information on the touchscreen. As set forth above and as acknowledged by the Examiner, Bridson neither discloses nor suggests such features, or the claimed combination. Further, as set forth above, Norwood is not properly combined with Bridson, and thus fails to overcome the deficiencies of Bridson.

Accordingly, it is respectfully submitted that independent claim 26 is allowable over the applied combination, and thus the rejection of independent claim 26 under 35 U.S.C. §103(a) over Bridson in view of Norwood should be withdrawn. Dependent claims 27-30 are allowable at least for the reasons discussed above with respect to independent claim 26, from which they depend, as well as for their added features.

The Office Action rejects claims 3-6, 10-13, and 17-18 under 35 U.S.C. §103(a) as being unpatentable over Bridson in view of Norwood, and further in view of Omori, U.S. Patent No. 5,675,363 (hereinafter "Omori"). The rejection is respectfully traversed.

Dependent claims 3 and 10-13 are allowable over Bridson and Norwood at least for the reasons discussed above with respect to independent claims 1 and 2, from which they respectively depend, as well as for their added features. Further, Omori is merely cited to teach the use of a memory storage means divided into a plurality of blocks, and thus fails to overcome the deficiencies of Bridson and Norwood. Accordingly, it is respectfully submitted that dependent claims 3 and 10-13 are allowable over the applied combination and thus the rejection of claims 3 and 10-13 under 35 U.S.C. §103(a) over Bridson, Norwood, and Omori should be withdrawn.

Independent claim 4 recites, *inter alia*, receiving user generated image data corresponding to items stored in the refrigerator. As set forth above, Bridson neither discloses nor suggests such features. That is, as set forth above, the communications module 12 and touchscreen disclosed by Bridson are not capable of receiving user generated image data. Further, as set forth above, the screen table 18 disclosed by Norwood, which requires a separate, stand alone personal computer in order to enable its various functions, is not properly combined with Bridson, and thus fails to overcome the deficiencies of Bridson. Still further, Omori is merely

cited to teach the use of a memory storage means divided into a plurality of blocks, and thus fails to overcome the deficiencies of Bridson and Norwood.

Accordingly, it is respectfully submitted that independent claim 4 is allowable over the applied combination, and thus the rejection of independent claim 4 under 35 U.S.C. §103(a) over Bridson, Norwood, and Omori should be withdrawn. Dependent claims 5-6 and 17-18 are allowable at least for the reasons discussed above with respect to independent claim 4, from which they depend, as well as for their added features.

The Office Action rejects claims 9 and 25 under 35 U.S.C. §103(a) as being unpatentable over Bridson in view of Norwood, and further in view of McGill et al., U.S. Patent Publication No. 2002/0016734 (hereinafter "McGill"). The rejection is respectfully traversed.

Dependent claims 9 and 25 are allowable over Bridson and Norwood at least for the reasons discussed above with respect to independent claims 7 and 21, from which they respectively depend, as well as for their added features. Further, McGill is merely cited to teach the use of a repetition cycle feature in an integrated household management system, and thus fails to overcome the deficiencies of Bridson and Norwood. Accordingly, it is respectfully submitted that claims 9 and 25 are also allowable over the applied combination, and thus the rejection of claims 9 and 25 under 35 U.S.C. §103(a) over Bridson, Norwood, and McGill should be withdrawn.

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Amdt. dated August 10, 2004
Reply to Office Action of May 19, 2004

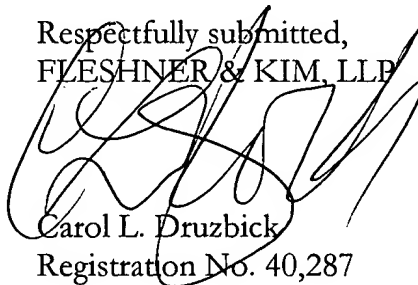
Docket No. IK-0020

CONCLUSION

In view of the foregoing amendments and remarks, it is respectfully submitted that the application is in condition for allowance. If the Examiner believes that any additional changes would place the application in better condition for allowance, the Examiner is invited to contact the undersigned attorney, **Carol L. Druzbeck**, at the telephone number listed below.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this, concurrent and future replies, including extension of time fees, to Deposit Account 16-0607 and please credit any excess fees to such deposit account.

Respectfully submitted,
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A large, stylized handwritten signature in black ink, appearing to be 'Carol L. Druzbeck', is written over the typed name and firm name.

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Fig. 3

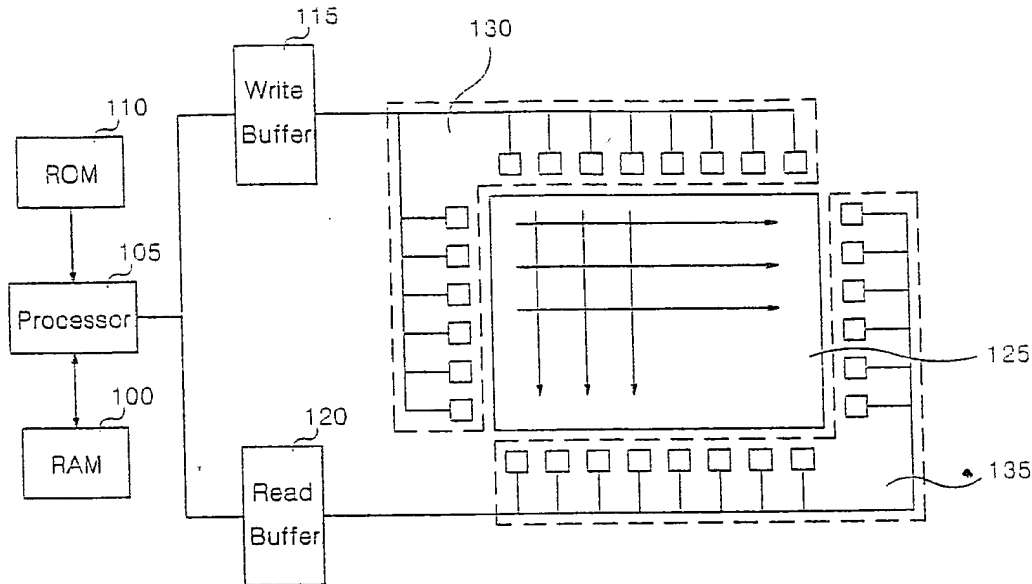


Fig. 4

